

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Develop Additional
Methods to Implement the California Renewables
Portfolio Standard Program.

Rulemaking 06-02-012
(Filed February 16, 2006)

**COMMENTS OF THE SOLAR ALLIANCE ON
PROPOSED DECISION OF ALJ SIMON**

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In accord with Rule 14.3 of the Rules of Practice and Procedure of the California Public Utilities Commission (Commission), the Solar Alliance comments upon the Proposed Decision of ALJ Simon Decision Authorizing the Use of Renewable Energy Credits for Compliance with California Renewable Portfolio Standard issued in the above captioned proceeding on March 26, 2009 (Proposed Decision or PD).

I. INTRODUCTION

The Solar Alliance applauds the Proposed Decision's determination to authorize the use of unbundled and tradable renewable energy credits (TRECs) for compliance with the renewable portfolio standard (RPS) program, and in doing so, placing no restrictions on who can participate in the market. In this regard, the Solar Alliance believes that use of TRECS for RPS compliance, as well placing no formal restrictions on who can participate in the market will provide more options and flexibility for RPS obligated load serving entities to comply with RPS mandates, and will also provide additional resources and incentives for the development of RPS eligible generation. The Solar Alliance commends assigned ALJ Simon and the office of Assigned Commissioner Peevey for their efforts in parsing through the record of the proceeding and issuing a PD that will serve to advance the renewables market in California. The Solar

Alliance submits that the Commission should expeditiously adopt the PD with limited changes as discussed below.

II. REQUESTED CHANGES TO ORDERING PARAGRAPHS

A. The Limitation on TRECs should be Increased

The PD would require that no more than 5% of the MWh used to meet Annual Procurement Targets (APT) in any year may be in the form of TRECs. This limitation on the use of TRECs is overly restrictive. The Proposed Decision (at p. 27) bases this limitation on the assertion that “TREC deals, no matter the length of their term or the length of time the generation facility has been operating, do not provide for the long-term delivery of fixed-price power, and thus do not contribute to price stability.” This rationale, however, does not account for the benefit of demand side reduction that distributed generation systems provide. In situations where the customer uses the power on-site and/or net meters it back to the utility, the utility and ratepayer receive the benefit of long-term power reduction.

The Solar Alliance respects that the Proposed Decision’s primary purpose in setting the limitation “is to allow the Commission to gain experience with how a TREC market functions and how TRECs can help the state reach its RPS and GHG goals.”¹ However, the proposed 5% of the APT limitation severely hampers the ability of customer side distributed systems to participate in the REC market place. The Solar Alliance suggests that the cap be increased to ensure that DG solar system owners can participate in this program and help to contribute to meeting RPS goals.

B. Metering Requirements for Small Renewable Generators

WREGIS is currently considering whether to modify the minimum metering

¹ See PD at p. 29.

requirements for the smallest class of renewable generators to allow 5% accurate inverter integrated meters to be used. In parallel, the California Solar Initiative program is allowing small solar generators (50 kW and smaller) to meter using 5% accurate inverter integrated meters, but beginning January 1, 2010, these meters will have to be tested to a metering accuracy specification that the CPUC and the California Solar Initiative Program Administrator's are currently developing. It is therefore the recommendation of the Solar Alliance that the CPUC allow renewable generators of 50 kW or smaller to meet the minimum metering requirements for tradable renewable energy credit certification using 5% accurate inverter integrated meters, so long as these meters have been tested and certified to the CSI Program's 5% metering accuracy test specification.

C. Transitional Nature of Price Cap

The Proposed Decision determines that in order to provide temporary protections for ratepayers without damaging the basic structure of the TREC market, a price cap of \$50/REC for purchases by IOUs should be imposed. In doing so, however, the PD (at p. 41) also recognized the transitional need for the price:

Price volatility and high prices are not a necessary outcome of the predicted situation of short TREC supply, but they are a significant risk. We conclude that this is a risk that ratepayers should not be required to bear in the short term. We believe that it is possible to create *temporary protections* for ratepayers through imposition of a price cap without damaging the basic structure of the TREC market or undermining the financial incentives for new renewable construction that are among the longer-term benefits of a TREC market.

The Solar Alliance agrees that given the uncertainty of the risk, the need for protection should be temporary at best. The PD, however, does not capture the temporary nature of the cap. Rather the PD establishes a protracted process to commence two years after the establishment of the TREC market which may or may not result in lifting the price cap. Such does not comport with

the concept of a temporary cap.² Accordingly, the Solar Alliance submits that the PD be modified to capture the language contained in the earlier released PD which defined the end date of this transitional price cap, and stated that the price cap will end upon the earlier of these events: (1) all IOUs attain the 20% goal; or (2) January 1, 2012.³

Accordingly, the Solar Alliance requests that ordering paragraph 16 be modified as follows:

“Until the earlier of (1) all investor owned utilities (IOUs) attaining the 20% renewables goal, or (2) January 1, 2012, no RECs for which the levelized amount paid is greater than \$50.00 per REC may be used for RPS compliance by an IOU.”

Additionally, if there is a new legally binding RPS goal, then the price cap should be reviewed in light of the new goal. The assigned Commissioner or ALJ in R.08-08-009 or its successor proceeding is authorized to issue any rulings needed to effectuate any review of the \$50/REC price cap on TRECs used for RPS compliance.

III. CONCLUSION

The Solar Alliance supports the Proposed Decision and seeks its expeditious adoption with the clarifying modifications set forth above.

² See PD at p. 42 (“this cap on the prices of TRECs used for RPS compliance should be a temporary one.”)

³ See Original PD at p. 36.

CERTIFICATE OF SERVICE

I, Lisa Vieland, certify that I have on this 15th day of April 2009 caused a copy of the foregoing

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to be served on all known parties to R.06-02-012 listed on the most recently updated service list available on the California Public Utilities Commission website, via email to those listed with email and via U.S. mail to those without email service. I also caused courtesy copies to be hand-delivered as follows:

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I declare under penalty of perjury that the foregoing is true and correct. Executed this 15th day of April 2009 at San Francisco, California.

/s/ Lisa Vieland
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